

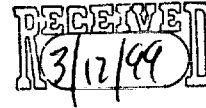


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1285 '99 MAR 23 P2:15

March 15, 1999

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street, SW
Washington, DC 20204



Dear Sirs:

Notice is hereby given pursuant to the requirements of Section 403(r)(6) (21 U.S.C. § 343(r)(6)) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR § 101.93, that Rexall Sundown, Inc. located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement within the last thirty days under the Sundown Herbals brand name bearing the following statement(s) on the label and/or in the labeling:

Elderberry: [It] promotes healthy immune function. The Elder (berry and fruit) is rich in flavonoids and contains numerous beneficial compounds that help support healthy immune function and promote general well-being. Many people who rely on herbals to maintain their well-being are discovering Elderberry, especially during the winter months. Sundown used only premium quality Elder. To further support the immune system and promote general well-being during the winter months, take Sundown Whole Herb Elderberry with Sundown Echinacea and Sundown Vitamin C. Echinacea naturally helps your body by gently enhancing immune function. Vitamin C is an important antioxidant that helps promote healthy immune function.

The undersigned certifies that the information contained in this notice is complete and accurate and that Rexall Sundown, Inc. has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

Deborah Shur Trinker
Vice President of Regulatory Affairs
and Assistant General Counsel

Enclosure